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NALCO Champion
An Ecolab Company

RECEIVE

3130 FM 521
FRESNO, TX 77545

MAY -8 2014

Air/Toxics & Inspection
Coordination Branch
6EN-A

07 May 2014

Federal Express Overnight

U.S. Environmental Protection Agency
Region 6, Air Enforcement 6EN-A
1445 Ross Avenue (6PD)
Dallas, Texas 75202-2733
(214) 665-8124

RE: Annual Compliance Certification & Semi-Annual Deviation Report
Nalco Champion
Fresno, Fort Bend County, Texas
Operating Permit Number: O3526
Regulated Entity Number: RN5101618882
Customer Reference Number: CN600361869

Dear EPA Representative:

Enclosed please find the Title V Permit Compliance Certification and associated semi-annual Deviation Report for the above referenced site. The Permit Compliance Certification covers the period from April 9, 2013 to April 9, 2014. The Deviation Report includes documentation from the compliance period starting November 9, 2013 and ending April 8, 2014.

If you have any question regarding this submittal, please contact me at (281) 710-9357 or Ms. Hanh Duong, Senior Environmental Engineer, at 281-710-9599.

Sincerely,

V. Bruce McFarland
SH&E Superintendent

VM/vm

Enclosures

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION

RN: 101618882	CN: 600361869	Account No.: FG-0053-G
Permit No.: O3536	Project No.: TBA	
Area Name: Fresno Plant	Company Name: Champion Technologies Inc.	

II. CERTIFICATION TYPE *(Please mark the appropriate box)*

☐ Responsible Official ☒ Duly Authorized Representative

III. SUBMITTAL TYPE *(Please mark the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application ☐ Update to Permit Application

☐ GOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening

☒ Other: Annual Permit Compliance Certification

IV. CERTIFICATION OF TRUTH

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Chris Gonzales *(Certifier Name printed or typed)* certify that I am the DAR *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From _____ *Start Date* to _____ *End Date*

Specific Dates: 05/07/2014 *Date 1* _____ *Date 2* _____ *Date 3* _____ *Date 4* _____ *Date5* _____ *Date 6*

Signature: _____ Signature Date: 05/07/2014

Title: Plant Manager

Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification - PCC (Part 1)

Permit Holder Name	Champion Technologies, Inc.	**Customer Number**	**CN600361869**
Area Name	Fresno Plant	**Account Number**	**FG-0053-G**
Operating Permit Number	**O3536**	**Report Submittal Date**	04/08/2014
Certification Period Start Date	04/09/2013	**End Date**	04/09/2014

I. Certification of Continuous Compliance with Permit Terms and Conditions **(Indicate response by placing an 'x" in the appropriate column for each of the following questions)**	**Response: Yes**	**No**
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	[X]	[ ]

II. Summary of Deviations **(Indicate response by placing an 'x" in the appropriate column for each of the following questions)**	**Response: Yes**	**No**
A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency? If the answer to the question is 'Yes', please complete and attach Part 2 to this submittal. *Important Note:* If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	[X]	[ ]
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	[X]	[ ]

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	Champion Technologies, Inc.	**Customer Number**	**CN600361869**
Area Name	Fresno Plant	**Account Number**	**FG-0053-G**
Operating Permit Number	**O3536**	**Report Submittal Date**	04/08/2014
Certification Period Start Date	04/09/2013	**End Date**	04/09/2014

Identification of Deviation Reports Submitted During the Certification Period
(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
11/7/2013	Semi-annual deviation report and OP-CRO1. 30 TAC §122.146	TCEQ Reg. 12	Y
11/7/2013	Semi-annual deviation report and OP-CRO1. 30 TAC §122.146	TCEQ Austin	Y

Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC – Monitoring Options Selected (Part 3)

Permit Holder Name	Champion Technologies, Inc.	**Customer Number**	**CN600361869**
Area Name	Fresno Plant	**Account Number**	**FG-0053-G**
Operating Permit Number	**O3536**	**Report Submittal Date**	04/08/2014
Certification Period Start Date	04/09/2013	**End Date**	04/09/2014

ID Number		Regulatory Requirement (Rule or Permit No. and Prov.)	Pollutant Monitored	SOP or GOP Index Number	Monitoring Option Used	Dates		Description/Comments
Unit ID	Group ID				Specific Citation	Begin	End	

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.				**Customer Number**	CN600361869	
Area Name	Fresno Plant				**Account Number**	FG-0053-G	
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1		3/26/2014	20:06	3/26/2014	21:44	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
2		2/15/2014	22:12	2/15/2014	22:23	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
3		2/15/2014	21:18	2/15/2014	21:19	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
4		2/15/2014	08:15	2/15/2014	08:16	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
5		2/11/2014	02:22	2/11/2014	07:14	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
6		2/8/2014	23:15	2/8/2014	23:48	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.				**Customer Number**		CN600361869
Area Name	Fresno Plant				**Account Number**		FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
7		2/6/2014	17:56	2/6/2014	17:57	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
8		2/4/2014	20:23	2/4/2014	20:24	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
9		2/3/2014	00:40	2/3/2014	00:41	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
10		2/2/2014	10:26	2/2/2014	10:27	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
11		1/30/2014	18:10	1/31/2014	11:11	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
12		1/30/2014	17:33	1/30/2014	17:48	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.				**Customer Number**		CN600361869
Area Name	Fresno Plant				**Account Number**		FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/6/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
13		1/30/2014	16:28	1/30/2014	16:29	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
14		1/30/2014	16:05	1/30/2014	04:06	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
15		1/30/2014	7:40	1/30/2014	07:41	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
16		1/30/2014	03:50	1/30/2014	03:51	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
17		1/29/2014	22:27	1/29/2014	22:28	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
18		1/29/2014	22:09	1/29/2014	22:10	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
19		1/29/2014	09:13	1/29/2014	09:14	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
20		1/29/2014	07:13	1/29/2014	07:14	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
21		1/29/2014	01:17	1/29/2014	01:18	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
22		1/28/2014	08:41	1/28/2014	08:42	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
23		1/28/2014	07:11	1/28/2014	07:12	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
24		1/28/2014	04:07	1/28/2014	04:08	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
25		1/27/2014	22:44	1/27/2014	11:01	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
26		1/27/2014	19:56	1/27/2014	19:57	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
27		1/27/2014	17:20	1/27/2014	19:17	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
28		1/27/2014	13:21	1/27/2014	13:22	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
29		1/27/2014	13:09	1/27/2014	13:10	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
30		1/27/2014	11:35	1/27/2014	12:23	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
31		1/27/2014	09:49	1/27/2014	10:38	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
32		1/27/2014	09:07	1/27/2014	09:08	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
33		1/21/2014	19:46	1/21/2014	19:47	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
34		1/17/2014	04:02	1/17/2014	14:03	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
35		1/15/2014	06:15	1/15/2014	06:16	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
36		1/10/2014	19:06	1/10/2014	19:44	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
37		1/10/2014	14:09	1/10/2014	02:10	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
38		1/10/2014	13:30	1/10/2014	13:31	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
39		12/22/2013	05:03	12/22/2013	05:04	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
40		12/20/2013	21:16	12/20/2013	21:17	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
41		12/13/2013	16:38	12/13/2013	16:47	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
42		12/7/2013	13:08	12/7/2013	13:32	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
F-1	F-1	11	None	Permit 4005 (S.C.4)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
43		11/19/2013	07:51	11/19/2013	08:16	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
44		10/19/2013	05:14	10/19/2013	05:15	1	Maximum flare tip velocity > 60 ft/sec	An alarm will be added to the distributed control system to alert operators when the flare tip velocity reaches 60 ft/sec. Operators will be trained to better understand flowrates to the flare that will keep the flare tip velocities below 60 ft/sec.
					Total Deviations:	2	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S1,2	S1,2	11	None	Permit 4005 (S.C.6)	Standard	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
45		10/9/2013	00:00	4/8/2014	24:00	25	Scrubbing solution alkalinity testing records could not be located.	A procedure will be written to ensure samples are taken, lab tests are completed, data is recorded, and test results are communicated to appropriate plant personnel so alkalinity can be adjusted, if needed. Plant personnel will also be retrained on the requirements for keeping the alkalinity testing records.
					Total Deviations:	25	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
79S-2A	79S-2A	11	None	Permit 4005 (S.C.7)	Standard	N/A	Permit	Monthly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
46		11/1/2013	00:00	11/31/2013	24:00	1	Monthly pH meter calibration was not completed.	Additional personnel have been trained to complete the pH meter calibrations.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/8/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
79S-2B	79S-2B	11	None	Permit 4005 (S.C.7)	Standard	N/A	Permit	Continuous

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
47		3/14/2014	10:27	3/16/2014	07:29	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
48		3/13/2014	12:30	3/13/2014	16:36	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
49		3/12/2014	16:59	3/12/2014	18:14	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
50		3/11/2014	07:07	3/12/2014	12:37	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
51		3/10/2014	12:32	3/10/2014	23:46	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
52		3/1/2014	09:11	3/5/2014	02:06	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
79S-2B	79S-2B	11	None	Permit 4005 (S.C.7)	Standard	N/A	Permit	Continuous

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
53		2/28/2014	08:11	2/28/2014	13:30	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
54		2/27/2014	11:39	2/28/2014	05:50	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
55		2/22/2014	05:54	2/25/2014	01:37	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
56		2/20/2014	23:57	2/21/2014	15:56	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
57		2/17/2014	16:30	2/20/2014	17:31	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
58		2/3/2014	04:32	2/15/2014	11:27	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.				**Customer Number**		CN600361869
Area Name	Fresno Plant				**Account Number**		FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
79S-2B	79S-2B	11	None	Permit 4005 (S.C.7)	Standard	N/A	Permit	Continuous

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
59		2/2/2014	02:00	2/2/2014	13:22	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
60		2/1/2014	03:32	2/1/2014	05:56	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
61		1/27/2014	15:58	1/27/2014	21:14	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
62		1/27/2014	11:14	1/27/2014	12:00	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
63		1/26/2014	12:16	1/26/2014	17:12	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
64		1/22/2014	14:31	1/22/2014	17:19	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361889
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
79S-2B	79S-2B	11	None	Permit 4005 (S.C.7)	Standard	N/A	Permit	Continuous

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
65		1/19/2014	21:20	1/19/2014	21:37	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
66		11/19/2013	11:34	11/19/2013	13:05	1	10 > pH > 12	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	2	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
79S-2B	79S-2B	11	None	Permit 4005 (S.C.7)	Standard	N/A	Permit	Monthly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
67		1/1/2014	00:00	1/31/2014	24:00	1	Monthly pH meter calibration was not completed.	Additional personnel have been trained to complete the pH meter calibrations.
				Total Deviations:		1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
CAS	CAS	11	None	Permit 4005 (S.C.10)	Standard	N/A	Permit	Daily

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
68		10/9/2013	00:00	4/8/2014	24:00	181	VOC sampling records to determine breakthrough could not be located.	VOC sampling will be added the operator round sheets to ensure sampling is completed on a daily basis. Operators will be retrained on all permit requirements relating to the carbon adsorption system.
					Total Deviations:	181	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.						Customer Number	CN600361869
Area Name	Fresno Plant						Account Number	FG-0053-G
Report Period Start Date	10/9/2013	Report Period End Date	4/8/2014	Operating Permit Number	O3536		Report Submittal Date	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S-7951	S-7951	11	None	Permit 4005 (S.C.8)	Standard	N/A	Permit	Weekly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
69		10/9/2013	00:00	4/8/2014	24:00	25	Scrubbing solution acidity testing records could not be located.	A procedure will be written to ensure samples are taken, lab tests are completed, data is recorded, and test results are communicated to appropriate plant personnel so alkalinity can be adjusted, if needed. Plant personnel will also be retrained on the requirements for keeping the acidity testing records.
					Total Deviations:	25	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S-114-03	S-114-03	11	N/A	Permit 4005 (S.C.11)	Standard	N/A	Permit	Once/Minute

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
70		4/3/2014	23:00	4/4/2014	03:45	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
71		3/29/2014	09:00	3/29/2014	12:37	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
72		3/26/2014	10:36	3/26/2014	14:31	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
73		3/18/2014	13:19	3/18/2014	13:52	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
74		3/11/2014	23:09	3/12/2014	00:07	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
75		3/12/2014	03:38	3/12/2014	04:12	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.				**Customer Number**		CN600361869
Area Name	Fresno Plant				**Account Number**		FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S-114-03	S-114-03	11	N/A	Permit 4005 (S.C.11)	Standard	N/A	Permit	Once/Minute

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
76		3/9/2014	06:53	3/10/2014	07:48	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
77		3/6/2014	07:23	3/8/2014	15:58	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
78		2/27/2014	17:57	2/28/2014	07:18	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
79		2/26/2014	18:21	2/26/2014	20:54	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
80		2/11/2014	10:45	2/11/2014	11:51	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
81		1/22/2014	08:34	1/22/2014	16:07	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S-114-03	S-114-03	11	N/A	Permit 4005 (S.C.11)	Standard	N/A	Permit	Once/Minute

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
82		1/15/2014	13:32	1/15/2014	16:50	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
83		1/12/2014	18:41	1/13/2014	05:27	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
84		12/28/2013	23:08	12/29/2014	01:10	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
85		12/12/2013	11:12	12/12/2013	12:31	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
86		12/7/2013	08:52	12/9/2014	03:38	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
87		12/5/2013	14:11	12/6/2013	10:43	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					Customer Number	CN600361869
Area Name	Fresno Plant					Account Number	FG-0053-G
Report Period Start Date	10/9/2013	Report Period End Date	4/8/2014	Operating Permit Number	O3536	Report Submittal Date	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S-114-03	S-114-03	11	N/A	Permit 4005 (S.C.11)	Standard	N/A	Permit	Once/Minute

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
88		12/4/2013	10:10	12/4/2013	10:24	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
89		11/9/2013	04:26	11/9/2013	16:45	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
90		10/27/2013	20:21	10/27/2013	22:17	1	pH ≥ 8.0	An alarm will be added to the distributed control system to alert operators when the pH is outside the specifed range. Operators will be trained to document corrective actions taken to bring the scrubber back into the specifed range and any process operations occurring at the time that may have caused the excursions.
					Total Deviations:	3	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					Customer Number	CN600361869
Area Name	Fresno Plant					Account Number	FG-0053-G
Report Period Start Date	10/9/2013	Report Period End Date	4/8/2014	Operating Permit Number	O3536	Report Submittal Date	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
S-114-03	S-114-03	11	N/A	Permit 4005 (S.C.11)	Standard	N/A	Permit	Weekly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
91		12/29/2013	00:00	2/6/2014	24:00	6	Weekly monitoring device calibrations were not conducted.	Additional personnel have been trained to complete the pH meter calibrations.
92		11/17/2013	00:00	11/30/2013	24:00	2	Weekly monitoring device calibrations were not conducted.	Additional personnel have been trained to complete the pH meter calibrations.
93		10/27/2013	00:00	11/9/2013	24:00	2	Weekly monitoring device calibrations were not conducted.	Additional personnel have been trained to complete the pH meter calibrations.
					Total Deviations:	10	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FUG	FUG	11	VOC	Permit 4005 (S.C.12.E)	Standard	N/A	Permit	Weekly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
94		10/9/2013	00:00	4/8/2014	24:00	25	Records of weekly connector inspections by AVO means could not be located.	AVO inspections are performed on a daily basis by plant operators, but documentation was not completed other than submitted spill/release reports. These inspections will be added the operator round sheets to create a record that inspections are being completed.
					Total Deviations:	25	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
FUG	FUG	S.C. 1.A	VOC	30 TAC §115.354(3)	Monitoring	R5352-ALL	Permit	Weekly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
95		10/9/2013	00:00	4/8/2014	24:00	25	Records of weekly connector inspections by AVO means could not be located.	AVO inspections are performed on a daily basis by plant operators, but documentation was not completed other than submitted spill/release reports. These inspections will be added the operator round sheets to create a record that inspections are being completed.
				Total Deviations:		25	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PPFUG	PPFUG	11	VOC	Permit 4005 (S.C.12.E)	Standard	N/A	Permit	Weekly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
96		10/9/2013	00:00	4/8/2014	24:00	25	Records of weekly connector inspections by AVO means could not be located.	AVO inspections are performed on a daily basis by plant operators, but documentation was not completed other than submitted spill/release reports. These inspections will be added the operator round sheets to create a record that inspections are being completed.
				Total Deviations:		25	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PPFUG	PPFUG	S.C. 1.A	VOC	30 TAC §115.354(3)	Monitoring	R5352-ALL	Permit	Weekly

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
97		10/9/2013	00:00	4/8/2014	24:00	25	Records of weekly connector inspections by AVO means could not be located.	AVO inspections are performed on a daily basis by plant operators, but documentation was not completed other than submitted spill/release reports. These inspections will be added the operator round sheets to create a record that inspections are being completed.
					Total Deviations:	25	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-4105	T-4105	16	N/A	30 TAC 122.132	Report	115-TANK2	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
98		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have proper controls on tank T-4105.	This unit has been taken out of service. A Title V permit amendment will be submitted to remove this unit from the permit and existing schedule.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					Customer Number	CN600361869
Area Name	Fresno Plant					Account Number	FG-0053-G
Report Period Start Date	10/9/2013	Report Period End Date	4/8/2014	Operating Permit Number	O3536	Report Submittal Date	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-4143	T-4143	16	N/A	30 TAC 122.132	Report	115-TANK2	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
99		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have proper controls on tank T-4143.	This unit is in the Compliance Schedule, but has been taken out of service. A Title V permit amendment will be submitted to remove this unit from the permit and existing Compliance Schedule.
Total Deviations:						1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					Customer Number	CN600361869
Area Name	Fresno Plant					Account Number	FG-0053-G
Report Period Start Date	10/9/2013	Report Period End Date	4/8/2014	Operating Permit Number	O3536	Report Submittal Date	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-7947	T-7947	16	N/A	30 TAC 122.132	Report	115-TANK2	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
100		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have vapor return line on tank T-7947.	This unit is on the Compliance Schedule, but the project cannot be completed due to line plugging issues created by the material stored in the tank. The plant plans to design and install a scrubber for vapor return line emissions or to move the material to another plant. A new compliance schedule will be developed and a Title V permit amendment submitted to change the existing schedule.
				Total Deviations:		1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PLT1LOAD	PLT1LOAD	16	N/A	30 TAC 122.132	Report	115-LOAD4	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
101		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have proper controls on Plant 1 containers and tanker truck loading.	This unit is on the Compliance Schedule. The control project for tank truck loading has been completed. The container loading project is still in progress with an expected completion date in 2Q2015 due to engineering and equipment manufacturing delays. A new compliance schedule will be developed and a Title V permit amendment submitted to change the existing schedule.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PLT2LOAD	PLT2LOAD	16	N/A	30 TAC 122.132	Report	115-LOAD4	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
102		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have proper controls on Plant 2 containers and tanker truck loading.	This unit is on the Compliance Schedule. The control project for tank truck loading has been completed. The container loading project is still in progress with an expected completion date in 2Q2015 due to engineering and equipment manufacturing delays. A new compliance schedule will be developed and a Title V permit amendment submitted to change the existing schedule.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PLT3LOAD	PLT3LOAD	16	N/A	30 TAC 122.132	Report	115-LOAD4	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
103		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have proper controls on Plant 3 containers and tanker truck loading.	This unit is on the Compliance Schedule. The control project for tank truck loading has been completed. The container loading project is still in progress with an expected completion date in 2Q2015 due to engineering and equipment manufacturing delays. A new compliance schedule will be developed and a Title V permit amendment submitted to change the existing schedule.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
PLT4LOAD	PLT4LOAD	16	N/A	30 TAC 122.132	Report	115-LOAD4	N/A	N/A

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
104		10/9/2013	00:00	4/8/2014	24:00	1	Failed to have proper controls on Plant 4 containers and tanker truck loading.	This unit is on the Compliance Schedule. The control project for tank truck loading has been completed. The container loading project is still in progress with an expected completion date in 2Q2015 due to engineering and equipment manufacturing delays. A new compliance schedule will be developed and a Title V permit amendment submitted to change the existing schedule.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
Permit	Permit	11	N/A	Permit 4005 (S.C.17)	Recordkeeping	N/A	Permit	Permit

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
105		10/9/2013	00:00	4/8/2014	24:00	1	Records of speciated hazardous air pollutants (HAPS) emitted from this site shall be updated two times per rolling 12 months and kept at the plant site in a rolling 24-month basis. These records could not be located.	Speciated HAPS emissions are established in the facility's emissions inventory. A spreadsheet will be developed to track to information required by the permit condition.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
R-112	R-112	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
106		10/17/2013	17:45	10/17/2013	18:45	1	At 17:45, plant rounds were made and a leaking sample port was noticed on R-112. Approximately 400 pounds was lost into the Plant 4 sump. The sample port vibrated open from the R-112 vibration.	A work order was written and the valve replaced. Material was pumped from the sump to the hazardous waste tank.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-4146	T-4146	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
107		11/13/2013		11/13/2013		1	While off-loading formalin to T-4146 a spill over occured spewing approximately 40-50 gallons of product into the contained area of Tank Farm 18. Spillage was due to a faulty tank level indicator. According to the tank level gauge there was enough available room to off-load 56900 lbs. The truck only contained 45580.	The material was neutraulized, cleaned-up, and properly disposed of without further incident. A work order was written and the level indicator was recalibrated.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361889
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-7948	T-7948	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
108		11/13/2013	07:30	11/13/2013	13:30	1	At 07:30, while transfering product from reactor R-113 to tank T-7948, the tank overflowed and spilled about 1500 lbs in the tank farm dike area. The tank gauge was showing 2700 lbs available space in the tank, but this was an incorrect reading.	An outside contractor was called-in to pump material from the dike. The spill was cleaned-up and properly disposed of without further incident. A work order was written to repair the tank gauge.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-7910	T-7910	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
109		4/5/2014	22:00	4/5/2014	22:20		Went to tank T-7910 to check line up, some 1506 material was on the ground. Amount released: 8 pounds (estimated). Release duration: 20 minutes.	The spill was cleaned-up and properly disposed of without further incident.
						Total Deviations:	0	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report? ☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-4134	T-4134	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
110		3/26/2014	09:00	3/26/2014	10:00	1	A small BHMT leak was discovered on the west side, bottom of tank T-4134. Amount released: less than 1 gallon/8 pounds. Release duration: 1 hour (estimated)	The spill was cleaned-up and properly disposed of without further incident. The tank has been taken out of service and cleaned so repairs can be made.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

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Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
T-7907	T-7907	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
111		1/29/2014	14:00	1/29/2014	22:00	1	While transferring a H2O/KOH solvent residue rinse to waste tank T-7907 the material was inadvertantly sent into a waste line that was out of service due to defects. The waste line leaked and approximately 400 lbs was spilled to the ground behind Plant 2.	An outside contractor was called-in to remediate the area where the spill occurred. The spill was cleaned-up and properly disposed of without further incident. The line has been locked-out.
					Total Deviations:	1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
R-108	R-108	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
112		1/2/2014		1/2/2014		1	A R-108 condensate line began leaking and spilled approximately 1 gallons of material.	A work order was written to repair the line. The remainder of the material was cleaned-up and properly disposed of without further incident.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361669
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
R-113	R-113	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
113		3/30/2014	0.8125	3/30/2014	0.84375	1	While heating the reactor up to 425F, blocked in, an operator noticed a leak coming from on top of R-113. Amount released: 200 - 300 pounds. Release duration: 45 minutes.	The spill was diverted to the plant sump system and sent to the hazardous waste tank. The remainder of the material was cleaned-up and properly disposed of without further incident.
					Total Deviations:	1	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO

Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 2)
30 TAC Chaper 101 Non-Reportable Emission Events

Permit Holder Name	Champion Technologies, Inc.					**Customer Number**	CN600361869
Area Name	Fresno Plant					**Account Number**	FG-0053-G
Report Period Start Date	10/9/2013	**Report Period End Date**	4/8/2014	**Operating Permit Number**	O3536	**Report Submittal Date**	5/7/2014

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
N/A	N/A	S.C. 2.F	VOC	30 TAC §116.110	Standard	N/A	Report	Other

Dev Item No.	STEERS Incident No.	Deviation Report				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
114		10/10/2013		10/10/2013		1	Two empty drums of C-5630 were left upside down on a pallet in Hot House 4. The drums still had enough material in them to leak out onto the ground.	The spill was cleaned-up and properly disposed of without further incident.
115		12/13/2013		12/13/2013		1	A 265 gallon tote of EB-2583 was stacked improperly in Hot House 2. Went the operator tried to secure the tote using his forklift, it slipped off of the base that was supporting it, hit the hot house wall and cracked when hitting the wall and falling on the fork. The operator then lifted the tote back up right and moved it into the Plant 2 high bay. Approximately, 130 gallons of the product spilled on the concrete floor.	The spill was cleaned-up and properly disposed of without further incident.
116		1/27/2014		1/27/2014		1	A rupture disk on a Plant 4 vacum pump blew a xylene/water mixture out of the relief nozzle. Approximately 15 gallons spilled onto the soil area behind Plant 4 and 50 gallons into the plant's containment area.	The spill was cleaned-up and properly disposed of without further incident. A work order was written to repair the rupture disk.
117		2/27/2014	15:00	2/27/2014	16:00	1	An Operator on a forklift was trying to get by some paraformaldehyde supersacks that had been stored on the floor in the warehouse. The forklift blades caught the bag and ripped it open, spilling material onto the warehouse floor. Amount released: 500 pounds (estimated, solid material). Release duration: 1 hour (estimated)	The spill was cleaned-up and properly disposed of without further incident.
118		3/11/2014	13:30	3/11/2014	14:30	1	A Maintenace Mechanic was going to work on a air pump in the maintenance shop that was brought in by the Production Department for repair. The Mechanic hooked the pump up air to it to run it so he could see what was not working. When he turned on the pump, there was a lot of pressure released and it blew chemical all over the shop. Amount released: 1 gallon (estimated). Release duration: 1 hour (estimated)	The spill was cleaned-up and properly disposed of without further incident. A new process was also given to the Production Department for cleaning pumps prior to bringing them to the Maintenance Department for repair.
119		3/27/2014	14:50	3/27/2014	15:50	1	A drumming hose was resting on drum and it fell off causing lance to come out of the drum, spilling HAI-404M on the production area floor. Amount released: 5 gallons. Release duration: 1 hour (estimated)	The spill was cleaned-up and properly disposed of without further incident.
					Total Deviations:	6	**Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviaton report?**	☐ YES ■ NO